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Bay Area Air District:



February 15, 2019

Alicia Parker
City of Oakland
Bureau of Planning
250 Frank H. Ogawa, Suite 3315
Oakland, CA 94612

RE: Downtown Oakland Specific Plan – Notice of Preparation of a Draft
Environmental Impact Report

Dear Alicia Parker:

The Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for the Downtown Oakland Specific Plan (Plan) Draft Environmental Impact Report (DEIR). The Plan will provide a roadmap for how the area develops over the next 20 to 25 years through policy guidance on land use, transportation, housing, economic development, public spaces, cultural arts, and social equity.

The NOP finds that the proposed Plan could result in significant regional & local air quality impacts in the San Francisco Bay Area Air Basin. In addition, the Plan area boundary is adjacent to the West Oakland Community, a community identified by the Air District's Community Air Risk Evaluation (CARE) program and our program to implement Assembly Bill (AB) 617 as disproportionately impacted by air pollution.

Air District staff recommends the DEIR include the following information and analysis:

1. As identified by the Air District's CARE program and our Community Health Protection Program, the West Oakland Community is currently cumulatively impacted with air pollution, which makes any additional air pollution a potentially significant localized impact. We recommend that the DEIR use a very conservative significance threshold to evaluate impacts and mitigation requirements for this Plan.
2. The DEIR should provide background information on the Bay Area Air Basin's attainment status for all criteria pollutants and the implications for the region if these standards are not attained or maintained by statutory deadlines. In addition, the DEIR should provide background information regarding existing sources of air pollution and air pollution concentrations within the Plan area and the adjacent West Oakland Community. The DEIR should include a discussion of the health effects of exposure to air pollution in general and the existing health impacts occurring within the Plan area and the West Oakland community.

3. The DEIR should list the Air District as a responsible agency with permitting approval required for stationary sources of air pollution.
4. The GHG impact analysis should include an evaluation of the Plan's consistency with the California Air Resources Board 2017 Scoping Plan and State and Air District climate stabilization goals for 2030 and 2050. Please be advised that the Air District is in the process of updating the CEQA guidelines/thresholds and current thresholds for GHGs should not be used for this plan. Other elements of the Guidelines may still be useful, however. You may download a copy of the CEQA Guidelines from the Air District's website <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>.
5. The DEIR should estimate and evaluate the potential health risk to existing and future sensitive populations within the Plan area and the West Oakland community from toxic air contaminants (TAC) and fine particulate matter (PM_{2.5}) as a result of the Plan's construction and operation. Air District staff recommends that the DEIR include a cumulative site-specific analysis that includes all stationary and mobile sources expected from this Plan and the existing sources that could potentially impact the West Oakland Community directly and indirectly, including the Port of Oakland.
6. The DEIR should evaluate all feasible mitigation measures, both onsite and offsite, for all potentially significant air quality and GHG impacts identified in the DEIR. The DEIR should prioritize onsite mitigation measures, followed by offsite mitigation measures within the proposed Plan area and immediately adjacent communities. Examples of potential emission reduction measures that should be evaluated and considered include, but are not limited to:
 - Prohibiting or minimizing the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>)
 - Implementing green infrastructure and fossil fuel alternatives in the development and operation of the Plan, such as solar photovoltaic (PV) panels, renewable diesel, electric heat pump water heaters, and solar PV back-up generators with battery storage capacity.
 - Requiring construction vehicles to operate with the highest tier engines commercially available.
 - Providing funding for zero emission transportation projects, including a neighborhood electric vehicle program, community shuttle/van services and car sharing, and enhancement of active transportation initiatives, among others.
 - Providing funding for expanding and improving bicycle and pedestrian infrastructure and projects that improve pedestrian access to transit, employment and major activity centers.
 - Implementing a zero-waste program consistent with SB 1383 organic waste disposal reduction targets including the recovery of edible food for human consumption.

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7. The DEIR should evaluate the Plan's consistency with the Air District's 2017 Clean Air Plan (2017 CAP). The DEIR should provide a table that lists relevant 2017 CAP measures to the Plan in one column and the Plan's consistency with the measures in the second column. The 2017 CAP can be found on the Air District's website <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.
8. The Air District's CEQA website contains several tools and resources to assist lead agencies in analyzing plan alone and cumulative air quality impacts. These tools include guidance on quantifying local emissions and exposure impacts. View and download tools at <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>. In addition, Air District staff have developed and continue to refine, detailed information on air pollution sources in West Oakland.
9. The DEIR should include all appendices or technical documents relating to the air quality, toxic air contaminant and GHG analysis, such as emissions assessment calculation and the health risk assessment files. Without all the supporting air quality documentation, Air District staff may be unable to review the air quality and GHG analyses.

If you have any questions regarding these comments, or would like to schedule a meeting, please contact Areana Flores, Environmental Planner, at (415) 749-4616, or aflores@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director John J. Bauters
BAAQMD Director Pauline Russo Cutter
BAAQMD Director Scott Haggerty
BAAQMD Director Nate Miley
WOEIP Ms. Margaret Gordon
WOEIP Brian Beveridge